

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	
	:	19 Civ. 09439 (PKC)
v.	:	
	:	ECF Case
TELEGRAM GROUP INC. and TON ISSUER INC.,	:	
	:	
Defendant.	:	
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MOTION TO SEAL

Non-party Investor E, by and through its attorneys, hereby moves for an order sealing the documents identified in Appendix A of Investor E's accompanying memorandum of law and removing certain of those dockets from the public docket.

The grounds for this motion, as well as descriptions of the documents, are set forth in the accompanying memorandum of law. As the memorandum explains in detail, interests in proprietary rights, privacy rights, and encouraging assistance with enforcement outweigh the presumption of public access to the material Investor E seeks to seal.

A proposed order is attached.

Dated: February 4, 2020

Respectfully submitted,

S/ Charles A. Brown

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